

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:)	
TERRORIST ATTACKS ON SEPTEMBER 11, 2001)	
)	Civil Action No. 03 MDL 1570 (GBD)(SN)
)	ECF Case
)	

Motion of Martin F. McMahon & Associates to Withdraw as Counsel

Martin F. McMahon respectfully moves this Court to allow him and his firm to withdraw as counsel for Defendant Wael Jelaidan in this matter pursuant to Southern District of New York Local Civil Rule 1.4.¹

As set forth in the accompanying memorandum of points and authorities and the declaration of Martin F. McMahon, incorporated by reference, this motion is warranted for several reasons: a) After recurrent payment delays over the past two years Mr. Jelaidan is no longer able to pay Mr. McMahon's fees and has advised that he is unable to do so in the future; b) Mr. McMahon is unable to discuss urgent matters or matters pertinent to the representation with Mr. Jelaidan; c) Mr. McMahon is no longer able to timely dialogue with Mr. Jelaidan's counsel in Saudi Arabia, upon whom he depended for litigation coordination; and d) Compliance with this Court's prior orders places Mr. McMahon in an irreconcilably conflicting position with Mr. Jelaidan. For these reasons and those set forth in the accompanying memorandum of points and authorities and the declaration of Martin F. McMahon, incorporated by reference, Mr. McMahon respectfully requests that this Court grant this Motion to Withdraw.

¹ This motion to withdraw is not submitted in response to Plaintiffs' Executive Committees' May 1, 2018 correspondence to this Court (ECF No. 3988). We will respond to that correspondence separately.

Mr. McMahon served a copy of a draft of this Motion to Withdraw upon Mr. Jelaidan, but as of today, even though urged to do so, he did not respond with his consent or refusal.

Respectfully submitted,
/s/ Martin McMahon
Martin F. McMahon, Esq.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served the Motion to Withdraw through the Court's electronic transmission facilities and emailed to all relevant parties, including Wael Jelaidan, on the 3rd day of May, 2018.

/s/ Martin McMahon
Martin F. McMahon, Esq.